

**IRS NAMES LEADERSHIP TEAM FOR INTERNATIONAL TAX MATTERS AND
U.S. COMPETENT AUTHORITY**

WASHINGTON -- The Internal Revenue Service announced Wednesday the selections of Carol A. Dunahoo and Elvin T. Hedgpeth to help lead the agency's efforts on international tax issues.

Dunahoo will serve as Director, International, and as the U.S. Competent Authority, while Hedgpeth will be Deputy Director, International. They will be among the key players in the IRS's new Large and Mid-Size Business (LMSB) Division, headed by LMSB Commissioner Larry R. Langdon.

In these positions, Dunahoo and Hedgpeth will be responsible for a wide range of issues relating to international tax matters and global trading. These include ensuring consistent tax treatment of U.S. taxpayers concerning international issues, providing timely and effective implementation of tax treaty and tax information exchange, and advising the LMSB Commissioner on global tax administration issues.

"Carol and Elvin bring a broad range of experience and expertise to their positions," Langdon said. "As the IRS builds a strategy to effectively deal with the expanding global economy, we are pleased to have them as members of the LMSB leadership team."

"Carol has a particular expertise in international tax issues relating to e-commerce," Langdon said. "She has been a leader in discussions between corporate tax executives and government officials regarding electronic commerce tax policy issues. Elvin is an expert in international tax administration and has represented the U.S. Treasury and IRS at several international forums, including the Organization for Economic Cooperation and Development," Langdon said.

Dunahoo comes to IRS from PricewaterhouseCoopers, where she directed the firm's electronic commerce tax policy practice and advised multinational clients on a variety of international tax matters. Prior to joining Price Waterhouse in 1996, Dunahoo was Associate International Tax Counsel at the Department of the Treasury. During her tenure at Treasury, Dunahoo participated in the negotiation of new tax treaty agreements with Canada,

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France, Germany and Portugal and was responsible for matters concerning U.S. treaties with several other countries.

Dunahoo received her undergraduate degree from Yale College and earned a law degree from Harvard Law School in 1985.

Hedgpeth brings to the Deputy Director, International position more than 25 years experience at the IRS with international tax administration. Prior to his selection, Hedgpeth served as Director, International Programs and was responsible for administration of the exchange of information and mutual agreement programs of the income tax conventions of the U.S. as well as the oversight of the International Examiner Program and International Field Assistance Specialist Program. In addition, Hedgpeth represented the Treasury Department and IRS on tax administration and electronic commerce matters at the Organization for Economic Cooperation and Development.

A graduate of the University of Detroit in Michigan, Hedgpeth is a Certified Public Accountant and a member of the AICPA.

Dunahoo and Hedgpeth will report to the Commissioner, Large and Mid-Size Business Division within the IRS. The LMSB Division will serve approximately 210,000 of the largest corporations and partnerships in the U.S.

The LMSB Division will serve corporations, subchapter S corporations and partnerships with assets greater than \$5 million. These businesses are responsible for paying \$712 billion in taxes, including income, employment, excise and withholding taxes.

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